IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASSANDRA VONNAHME,

Defendant.

Case No. 23-CR-4019

MOTION TO WITHDRAW

COMES NOW, undersigned counsel, and hereby makes application to the Court for an order granting counsel's motion to withdraw from this matter and in furtherance and support thereof states the following;

- 1. Undersigned counsel was retained by Defendant to represent her in the above matter;
- 2. Defendant has failed to fulfill the financial obligations to the undersigned pursuant to the fee contract entered between the Defendant and Stowers & Nelsen, P.L.C.;
- 3. Defendant is believed to qualify pursuant to the Criminal Justice Act to have counsel appointed;
- 4. Defendant requests counsel be appointed through the Criminal Justice Act;

WHEREFORE, undersigned counsel requests the Court enter an order granting this motion to withdraw and appoint counsel to Defendant pursuant to the Criminal Justice Act.

Respectfully Submitted,

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/s/ James Nelsen_

James Nelsen, AT0005675 Attorney for Defendant Cassandra Vonnahme

Copy to: Cassandra Vonnahme- via email